



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

SEP 6 1988

MEMORANDUM

SUBJECT: Ordot PRAP Concerns

FROM: Rick Sugarek
Federal Response Section (P-4-3)

TO: Kent Kitchingman, Chief
Quality Assurance Management Section (P-3-2)

This is to provide for your further review our responses to the concerns you raised in your August 29, 1988 memorandum commenting on the Proposed Remedial Action Plan (PRAP) for the Ordot Landfill Superfund site.

- We agree that the contract recommended detection limits for vinyl chloride were not sufficiently low to determine whether the MCL for vinyl chloride was exceeded in leachate, ground water or surface water. The final Record of Decision (ROD) will be revised to accurately portray this aspect of the sampling effort and our knowledge of compliance of samples with all MCL's. As you know, we were simply comparing the quality of landfill leachate to the MCL's of drinking water only for purposes of illustrating the quality of leachate at the time sampling occurred. The final decisions regarding clean-up at the site are not based upon the leachate quality as a central issue but upon observed landfill operation practices.
- Further monitoring will be performed by EPA including necessary geological and hydrological work necessary to design a monitoring program. Our intent will be to detect as early as possible any migration of contaminants from Ordot Landfill towards the sole source drinking water aquifer.
- If Guam EPA is chosen as the appropriate group to perform further monitoring and analysis, compliance with all necessary QA/QC elements will be required and will include participation in the volatile portion of EPA's Water Supply and/or Water Pollution Laboratory Performance Evaluations Studies that you suggest.

I hope that this has adequately responded to your concerns.

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